

**United States Bankruptcy Court  
Northern District of Illinois, Eastern Division**

IN RE: Nekeshia S Smith ) Chapter 13  
Debtor(s) ) Case No. 18 B 30370  
                ) Judge LaShonda A. Hunt

**Notice of Motion**

Nekeshia S Smith  
4942 W Van Buren, Apt 1  
Chicago, IL 60644

Debtor Attorney: Cutler & Associates Ltd  
via Clerk's ECF noticing procedures

On January 07, 2019 at 10:30 am, I will appear at the location listed to the right, and present this motion.

I certify under penalty of perjury that this office caused a copy of this notice to be delivered to the persons named above by U.S. mail or by the methods indicated on or before Wednesday, December 19, 2018.

> Dirksen Federal Building  
> 219 South Dearborn  
> Courtroom 719  
> Chicago, IL 60604

/s/ MARILYN O. MARSHALL  
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MARILYN O. MARSHALL, TRUSTEE

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**Motion to Dismiss Case For Unreasonable Delay**

Comes now Marilyn O. Marshall, Standing Trustee, and requests that this case be dismissed, as Debtor(s) failed to file the required documents pursuant to 11 USC §521, §1307, §349, and Rule 3015, and in support thereof states the following:

1. Debtor(s) filed for Chapter 13 on 10/29/2018.
2. The debtor(s) have failed to propose a plan in good faith or to file a petition in good faith as required under §1325(a)(3) and (a)(7).
3. Debtor filed an incomplete plan; sections 2.2, 2.3, 5.1, and 7.1 are unanswered. Debtor was advised of these deficiencies at her Section 341 meeting held on November 28, 2018. Nevertheless, several weeks later, Debtor has failed to file a complete plan.
4. The debtor's failure to confirm a plan in a timely manner constitutes unreasonable delay.

WHEREFORE, the Trustee prays that this case be dismissed, and for any and all other relief this court deems just and proper.

Office of the Chapter 13 Trustee  
224 S Michigan Ave  
Ste 800  
Chicago, IL 60604  
(312) 431-1300

/s/ MARILYN O. MARSHALL  
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MARILYN O. MARSHALL, TRUSTEE